

THE MOTION ATTACHED HERETO SEEKS TO REJECT CERTAIN CONTRACTS AND LEASES. PARTIES RECEIVING THE MOTION WHOSE CONTRACTS OR LEASES ARE SUBJECT TO REJECTION SHOULD LOCATE THEIR NAMES ON EXHIBIT "A" TO THE PROPOSED FORM OF ORDER ATTACHED HERETO.

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Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

ACETO CORPORATION, *et al.*,¹

Debtors.

Chapter 11

Case No. 19-13448 (VFP)

(Jointly Administered)

Hearing Date: July 2, 2019 at 10:00 a.m. (ET)

Objection Deadline: June 25, 2019 at 4:00 p.m. (ET)

**NOTICE OF DEBTORS' SECOND OMNIBUS MOTION
FOR ENTRY OF AN ORDER AUTHORIZING REJECTION OF CERTAIN
EXECUTORY CONTRACTS AND UNEXPIRED LEASES (II) ESTABLISHING A
CLAIMS BAR DATE, AS APPLICABLE, AND (III) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on **July 2, 2019 at 10:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard, the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"), by and through their undersigned counsel, shall move (the "Motion") before the Honorable Vincent F. Papalia, United States Bankruptcy Judge, in

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: Aceto Corporation (0520); Tri Harbor Chemical Holdings LLC (*f/k/a* Aceto Agricultural Chemicals LLC, *f/k/a* Aceto Agricultural Chemicals Corporation) (3948); Tri Harbor Realty LLC (*f/k/a* Aceto Realty LLC) (7634); Kavod Pharmaceuticals LLC (*f/k/a* Rising Pharmaceuticals, LLC, *f/k/a* Rising Pharmaceuticals, Inc.) (7959); Kavod Health LLC (*f/k/a* Rising Health, LLC) (1562); Kavris Health LLC (*f/k/a* Acetris Health, LLC) (3236); KAVACK Pharmaceuticals LLC (*f/k/a* PACK Pharmaceuticals, LLC) (2525); Arsynco, Inc. (7392); and Acci Realty Corp. (4433).

Courtroom 3B of the United States Bankruptcy Court for the District of New Jersey, 50 Walnut Street, 3rd Floor, Newark, New Jersey 07102, for entry of a second omnibus order, substantially in the form submitted with the Motion (the “Proposed Order”), (i) authorizing the Debtors to reject the executory contracts and unexpired leases listed on Exhibit A to the Proposed Order, effective as of the Rejection Date indicated on Exhibit A to the Proposed Order, (ii) establishing a deadline to file proofs of claim reflecting rejection damages, if any, as applicable, and (iii) granting certain related relief.

PLEASE TAKE FURTHER NOTICE that the Debtors shall rely upon the Motion filed herewith. No brief is necessary as no novel issues of fact or law are presented by the Motion. A proposed form of order was also submitted therewith. Oral argument is requested in the event an objection is timely filed.

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be filed with the Clerk of the Court together with proof of service thereof, and served so as to be actually received by no later than **June 25, 2019 at 4:00 p.m. (Eastern Time)** by counsel to the Debtors, Lowenstein Sandler LLP, One Lowenstein Drive, Roseland, New Jersey 07068, Attn: Philip J. Gross, Esq. (pgross@lowenstein.com) and Michael Papandrea, Esq. (mpapandrea@lowenstein.com).

PLEASE TAKE FURTHER NOTICE that objections to the Motion, if any, must: (a) be in writing; (b) comply with the Bankruptcy Rules, the Local Rules of the United States Bankruptcy Court for the District of New Jersey, and other case management rules or orders of this Court; and (c) state with particularity the legal and factual basis for the objection.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served in accordance with this notice, it may not be considered by the Bankruptcy Court. In the event no objections are filed, the relief requested in the Motion may be granted without a hearing.

Dated: June 7, 2019

Respectfully submitted,

LOWENSTEIN SANDLER LLP

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